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Attorneys for Plaintiff  
9 UNITED STATES OF AMERICA  
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12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 RUSSELL GOMEZ DZUL,  
aka "RUSSELL OZUL GOMEZ,"  
18 aka "RUSSELL DZUL GOMEZ,"

19 Defendant.  
20  
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No. 2:25-mj-03509

MOTION TO DISMISS COMPLAINT  
WITHOUT PREJUDICE AGAINST  
DEFENDANT PURSUANT TO FEDERAL RULE  
OF CRIMINAL PROCEDURE 48(a)

22 The United States Attorney for the Central District of  
23 California hereby requests leave of the Court to dismiss the  
24 complaint against defendant RUSSELL GOMEZ DZUL, also known as  
25 ("aka") "RUSSELL OZUL GOMEZ," aka "RUSSELL DZUL GOMEZ," without  
26 prejudice.

27 The government's request for dismissal is made in good faith  
28 and in the interest of justice. The law "generally require[s] a

1 district court to defer to the government's decision to seek a  
2 dismissal of a criminal charge" under Rule 48(a) motions when they  
3 are not opposed by the defense. United States v. Gonzalez, 58 F.3d  
4 459, 462 (9th Cir. 1995).

5 Accordingly, the government requests that the Court grant this  
6 motion to dismiss the complaint without prejudice against defendant  
7 pursuant to Federal Rule of Criminal Procedure 48(a). The  
8 government further requests that defendant be released from the  
9 custody of the U.S. Marshals solely on this charge.

10 Dated: June 18, 2025

Respectfully submitted,

11 BILAL A. ESSAYLI  
12 United States Attorney

13 CHRISTINA T. SHAY  
14 Assistant United States Attorney  
Chief, Criminal Division

15 /s/

16 THI HOANG HO  
Assistant United States Attorney

17 Attorneys for Plaintiff  
18 UNITED STATES OF AMERICA  
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